



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON D.C., 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM

SUBJECT: Incident Reporting for Over-the-Top Dicamba Products for Genetically Modified Cotton and Soybean Crops

FROM: Robert A. Miller, 6(a)(2) Coordinator

TO: Dan Kenny, Branch Chief
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The Incident Data System (IDS) incorporates adverse effects information submitted by registrants under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) section 6 (a)(2), along with adverse effects information from other sources. Generally, the more significant information must be submitted promptly, and the report requires more detailed information; whereas, less important information may be aggregated and submitted on a quarterly basis. The scope of information required by registrants, to be submitted to the agency, includes both studies and incidents concerning all aspects of pesticidal activity; including adverse effects to non-target species, off-target movement of a pesticide, water contamination, degradates, contaminants, pesticide resistance and failures of efficacy. If reports appear to indicate a problem for a product, the agency may require the registrant(s) to develop additional incident data on the issue or, if appropriate, may require mitigation measures.

Between 2017-2019 the agency received a significant number of adverse effect incident reports to off-site vegetation from dicamba, which coincided with the 2017 introduction over-the-top (OTT) dicamba products for genetically modified cotton and soybean crops. As a result of the significant number of reports, in 2018 the EPA required enhanced reporting by registrants of these products. This enhanced incident reporting required registrants to report all available information on each plant damage incident on a monthly basis, regardless of the Exposure Severity Code.

Major plant damage incidents where $> 45\%$ of an exposed crop has been adversely affected is assigned the Exposure Severity Code P-A. Minor plant damage incidents where $< 45\%$ of an exposed crop has been adversely affected is assigned the Exposure Severity Code P-B. When the percent of plant damage is not reported the Exposure Severity Code is P.

Between 2017 and 2019 the agency received 7,779 individual major and minor plant damage incident reports from registrants and other sources allegedly involving OTT dicamba from various regions of the country. Between 2017 and 2019 the agency did not receive any crop damage incident reports from states involving OTT dicamba products. Incident reports are vastly under reported for various reasons. For example, often growers do not file a complaint against their neighbors.

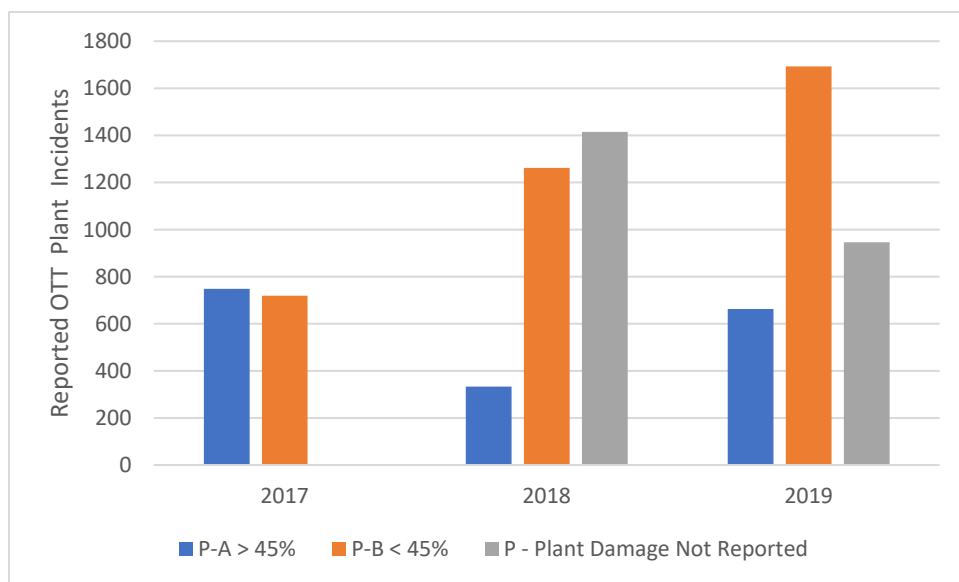


Figure 1. Number of Dicamba Incident Reports in the Agency's Incident Database System from 2017 to 2019.

The 2018 enhanced reporting requirements placed an end to reporting aggregate OTT dicamba plant incidents. The agency received from registrants 1,692 and 518 aggregate plant incident reports for 2017 and 2018, respectively.

The agency received 2,557 lack of efficacy reports for OTT dicamba from 2017-2019. BASF is the only registrant to submit lack of efficacy reports.

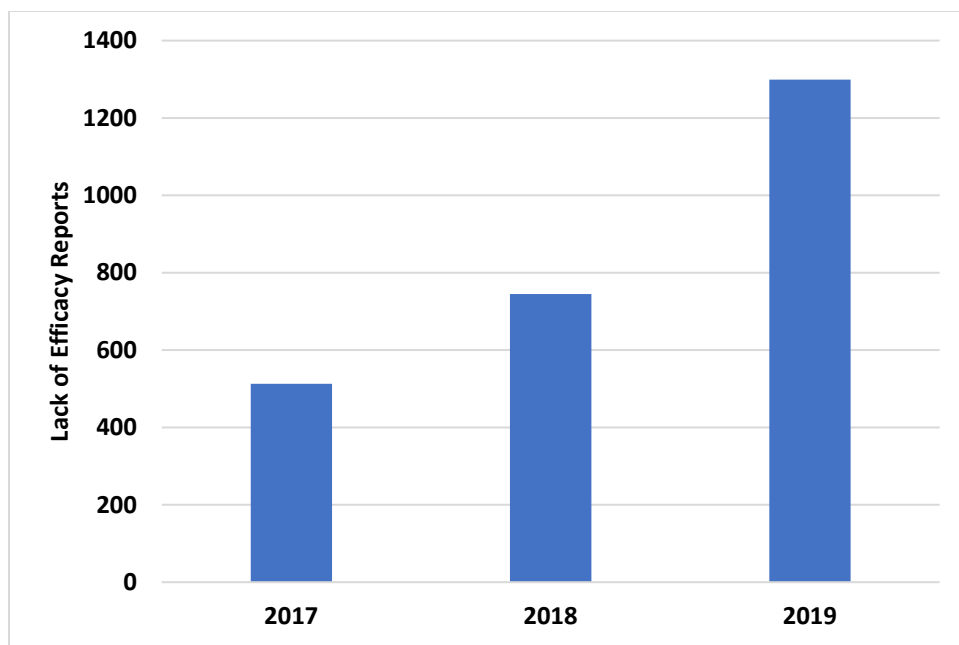


Figure 2. Number of OTT Dicamba Lack of Efficacy Reports in the Agency's Incident Database System from 2017 to 2019.

The state of Missouri provided the agency with a preliminary report titled *Detection of Dicamba in Rainwater and Missouri Streams During the 2019 Soybean Growing Season*. Detections of dicamba in Missouri rainwater and streams were given an Exposure Severity Code R. Dicamba was detected 119 times in this preliminary report.